

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>IN RE: Gustav Merkle</b>  <div style="text-align: center;"><b>Debtor(s)</b></div> <b>Medallion Bank</b>  <div style="text-align: center;"><b>Movant</b></div> <div style="text-align: center;"><b>vs.</b></div> <b>Gustav Merkle</b>  <div style="text-align: center;"><b>Respondent(s)</b></div>	<b>BK NO. 17-16317 mdc</b>  <b>Chapter 13</b>  <b>Hearing Date: 12/14/17</b>
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**OBJECTION OF MEDALLION BANK  
TO CONFIRMATION OF CHAPTER 13 PLAN**

Medallion Bank (hereinafter Secured Creditor), objects to confirmation of Debtor's Chapter 13 plan and asserts in support of its Objection as follows:

1. On October 6, 2017, Secured Creditor filed a secured proof of claim in the amount of \$36,857.00 with an annual interest rate of 17.950000%.
2. Debtor's Plan fails to provide treatment towards the claim of the Secured Creditor.
3. Debtor's Plan understates the amount of the Secured Creditor's claim by \$36,857.00, and does not provide sufficient funding to pay said claim.
4. Accordingly, Debtor's Plan is not feasible, as it does not fully compensate the Secured Creditor.
5. In addition, the Debtor's Plan fails to comply with 11 U.S.C. §§ 1322 and 1325.
6. Debtor(s) is/are delinquent in plan payments to the Chapter 13 Trustee in the amount of \$879.00.

WHEREFORE, the Secured Creditor, Medallion Bank, prays that the Court deny confirmation of the Debtor's Plan.

Respectfully submitted,

Date: November 14, 2017

By: **/s/ Rebecca A. Solarz, Esquire**  
Rebecca A. Solarz, Esquire  
KML Law Group, P.C.  
BNY Mellon Independence Center  
701 Market Street, Suite 5000  
Philadelphia, PA 19106  
215-627-1322  
Attorney for Movant/Applicant